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February 19, 2020

Via Electronic Submission at

<https://www.foiaonline.gov/foiaonline/action/public/request>

Attn: Regional Freedom of Information Officer
U.S. EPA, Region 4

Re: FOIA Request re: Stone's Throw Landfill in Tallassee, Alabama

Dear Regional FOIA Officer:

Pursuant to the Federal Freedom of Information Act, 5 U.S.C. §522, I request access to and copies of all documents including but not limited to, emails, correspondence, analyses, and reports pertaining to the Stone's Throw Landfill ("the Landfill") located at 1303 Washington Boulevard, Tallassee, Alabama, from January 1, 2003 to the present. Please also include documents referring to the Landfill by its previous name, Tallassee Waste Disposal Center.

Please include any and all documents, communications, records (including any electronically-stored materials), and other file contents within the custody and control of the U.S. EPA, with Advanced Disposal, Inc. and/or Stones Throw Landfill regarding permitting, operation and related matters at the Landfill. Please also include any and all documents indicating non-compliance with any EPA regulations or regulations of the Alabama Department of Environmental Management (ADEM), permit issuances, and any and all complaints to EPA or ADEM from the public.

Please include any and all documents, communications, records (including any electronically-stored materials), and other file contents within the custody and control of EPA as they relate to any monitoring information, complaints and similar documents regarding water quality of the Tallapoosa River at or near the Landfill, groundwater at or near the Landfill, and such documents with respect to the Landfill as they relate to the requirements of the Safe Drinking Water Act.

Please also include any and all documents, communications, records (including any electronically-stored materials), and other file contents within the custody and control of EPA relating to air emissions inspections, violations, findings of violation, and enforcement actions including but not limited to, sulfur dioxide and hydrogen sulfide for the Landfill.

Please include communications from and with employees in the External Civil Rights Compliance Office as well as its previous iteration, the Office of Civil Rights. Further, please

include communications among EPA staff as well as between EPA and stakeholder parties including, but not limited to, representatives of ADEM, the Ashurst Bar/Smith Community including Phyllis Gosa, Ron Smith or Ann Smith, Tallapoosa County Commissioners, Advanced Disposal and Mr. Herman Kitchens.

I am an attorney and make this request on behalf of my clients who have brought a civil action against those entities responsible for the ownership and/or operation of the Landfill. Our firm is willing to pay reasonable costs of searching and reproducing documents up to \$25.00. A response in electronic form sent to the following email addresses is preferred:

ejohnson@stewartandstewart.net
wts70@stewartandstewart.net
dstewart@stewartandstewart.net

If the documents to be reproduced are voluminous, please notify me as soon as possible so that I may personally review the file or otherwise attempt to narrow the scope of this request.

If my request is denied in whole or in part, I ask that you justify all deletions by reference to specific exemptions of the Act. I will also expect you to release all segregable portions of otherwise exempt material. I reserve the right to appeal your decision to withhold any information or to deny a waiver of fees. I look forward to your reply within 20 business days as the statute requires.

Thanking you, I am,

Sincerely,

/s/ Edward McF. Johnson

cc: Donald W. Stewart
W. Taylor Stewart